

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BATSHEVA LEVY

Plaintiff,

25 CV 831 (KMK)(VR)

v.

EXPERIAN INFORMATION SOLUTIONS, INC. ET AL

Defendants.

**PLAINTIFF'S NOTICE OF MOTION AND MOTION TO AMEND COMPLAINT TO
ADD ADDITIONAL DEFENDANT**

PLEASE TAKE NOTICE that Plaintiff, by and through undersigned counsel, hereby moves this Court pursuant to **Federal Rule of Civil Procedure 15(a)(2)** for an order granting leave to file an **Amended Complaint** to add an additional defendant. The Court has ordered that Barclays may respond by September 19, 2025. However, Counsel for Barclays has indicated to the undersigned that Barclays does not oppose the filing of an Amended Complaint against Trans Union. Therefore, Plaintiff requests that the Court consider the motion fully briefed at this time.

Plaintff respectfully moves this Court for an Order granting leave to amend the Complaint to join an additional party, Trans Union, LLC, which Plaintiff alleges is liable for the claims currently asserted. Defendant Barclays does not oppose amending the complaint to add Trans Union. In support of this motion, Plaintiff states as follows:

Plaintiff seeks leave to file an Amended Complaint to add an additional defendant, Trans Union, LLC, one of the three major credit reporting agencies, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. This motion is made early in the discovery process, with minimal procedural progress made, and is not sought for purposes of delay or bad faith. The proposed amendment will not prejudice the current Defendant, Barclays.

Plaintiff filed the original Complaint on January 28, 2025. Defendant Barclays filed an Answer on or about April 14, 2025. The parties have exchanged initial disclosures, and discovery has just commenced. In the Plaintiff's initial Complaint, Plaintiff has alleged similar allegations as against Experian and Equifax. Plaintiff has resolved those claims. Plaintiff has left those claims in the proposed Amended Complaint as they demonstrate the pervasive non compliance with the Fair Credit Reporting Act.

New facts have come to Plaintiff's attention suggesting that Barclays is also in violation concerning the failure to reinvestigate the Barclays and Trans Union's credit reporting of the Plaintiff's Barclays account as it is being reported in the Plaintiff's Trans Union report.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant leave to file the proposed Amended Complaint, attached hereto as **Exhibit A**.

Dated: August 5, 2025
Woodmere, New York

Respectfully submitted,

/s/

Adam J. Fishbein (AF-9508)
Attorney At Law

735 Central Avenue

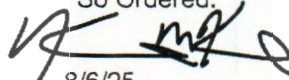
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Motion to Amend is granted. The
Clerk is respectfully directed to
terminate the Motion.

So Ordered.



8/6/25